



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

July 20, 2000

Mr. J. Roger Crawford
Outboard Marine Corporation
100 Sea Horse Drive
Waukegan, IL 60085-2195

Mr. Robert E. O'Hara
Illinois Environmental Protection Agency
Bureau of Land/Site Remediation Program
1021 North Grand Avenue East
Springfield, IL 62794-9276

Re: Outboard Marine Corporation Waukegan Plant 2
Request for Entry into Illinois Site Remediation Program

Dear Mr. Crawford and Mr. O'Hara:

This letter addresses the Outboard Marine Corporation (OMC) request that U.S. EPA provide the Illinois Environmental Protection Agency (IEPA) and OMC with its approval of OMC entering the Illinois Site Remediation Program for the matters addressed in the June 9, 2000, application that OMC submitted to IEPA to enter the Illinois Site Remediation Program. Specifically, OMC seeks to resolve the "Chlorinated Solvent Plume" and the "Leaking Underground Storage Tank Area" matters at its Waukegan Plant 2 facility through the Illinois Site Remediation Program rather than addressing these areas through the federal Superfund program. I understand that IEPA recently rejected OMC's June 9, 2000 application because the Waukegan Plant 2 facility is generally associated with the National Priorities List Outboard Marine Corporation site.

U.S. EPA generally agrees with OMC's assertion that the "Chlorinated Solvent Plume" and the "Leaking Underground Storage Tank Area" matters are readily separable from the several Superfund cleanup matters previously undertaken and/or now underway at the Outboard Marine Corporation Superfund site. Thus, U.S. EPA has no objection to the entry of these two matters into the Illinois Site Remediation Program.

Please contact me at (312) 886-7078 if you have any questions regarding this matter.

Sincerely,

-KA- (copy)
Kevin Adler
Waukegan Coke Plant Project Manager

US EPA RECORDS CENTER REGION 5



399190



OUTBOARD MARINE CORPORATION

100 Sea Horse Drive
Waukegan, Illinois 60085-2195
Phone 847/689-6200

July 14, 2000

Mr. Kevin Adler
Remedial Project Manager
Waukegan Harbor
Site-On-Scene Coordinator
U. S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604

Dear Kevin:

Re: OMC Illinois Site Remediation Program Request

Pursuant to my phone message to you concerning the above referenced matter, I am forwarding a copy of our application to IEPA to enter the Illinois Site Remediation Program. I am also forwarding a copy of IEPA's response denying our enrollment in the program because the OMC site is generally identified as NPL. IEPA has advised us that they will accept our application if USEPA provides a letter indicating its approval and concurrence that the identified matters are not part of the OMC Site NPL action and that such matters may be addressed by IEPA through the Site Remediation Program.

OMC is hereby requesting that USEPA provide IEPA and OMC a letter indicating USEPA's approval of OMC entering the Illinois Site Remediation Program for the matters identified in our June 9, 2000 application.

If you have further questions or comments pertaining to this matter, please contact either Mike Rehor (847-689-7046) or me (847-689-5219).

Very truly yours,

A handwritten signature in black ink, which appears to read "J.R. Crawford", is written over a horizontal line.

J. R. Crawford
Vice President
Environment, Health and Safety

JRC/lms
Enclosure

CC: Larry Schmitt, USEPA
J. Moran, OMC
M. Rehor, OMC



217/524-5533

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

June 12, 2000

Certified # 7099 3400 0006 5937 438

J. Roger Crawford, P.E., Vice President
Environmental, Health and Safety
Outboard Marine Corporation
100 Sea Horse Drive
Waukegan, IL 60085-2195

Re: 0971900017--Lake County
Waukegan/Outboard Marine Corporation
Site Remediation/Fiscal

Dear Mr. Crawford:

The Illinois Environmental Protection Agency ("Illinois EPA") is in receipt, as of June 09, 2000, of a Site Remediation Program Application and Services Agreement (DRM-1) Form for enrollment of the above referenced site into the Site Remediation Program and of a check in the amount of \$500 payable to the Illinois State Treasurer as an advance partial payment of Illinois EPA-incurred costs for providing review and evaluation services. Please be advised that the proposed project does not meet the eligibility criteria set forth in Section 58.1(a)(2) of the Environmental Protection Act (415 ILCS 5/58.1(a)(2)) and implementing regulations found at 35 Illinois Administrative Code ("35 IAC") Part 740.105(a)(1). Specifically, the application is denied because the above referenced site is on the National Priorities List (Appendix B of 40 CFR 300).


In accordance with 35 IAC 740.215(d), Illinois EPA denials of applications may be appealed by the Remediation Applicant to the Illinois Pollution Control Board within 35 days after receipt of the determination of denial. The check in the amount of \$500 and a copy of the DRM-1 form are hereby returned to you. The check has been stamped VOID by the Illinois EPA. If you have any questions in this matter, please feel free to contact me at the above number.

RECEIVED

JUN 15 2000

OMC CORPORATE EHS

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. O'Hara", with a long horizontal flourish extending to the right.

Robert E. O'Hara
Site Remediation Program
Remedial Project Management Section
Bureau of Land

Enclosures: Copy of DRM-1 form w/ correspondence and attachments
Check in amount of \$500 payable to Illinois State Treasurer, stamped VOID
by Illinois EPA



00-2202

0950200008
Outboard Marine
Corp.
SF/Tech

OUTBOARD MARINE CORPORATION

100 Sea Horse Drive
Waukegan, Illinois 60085-2195
Phone 847/689-6200

June 7, 2000

Mr. Bob O'Hara
Illinois Environmental Protection Agency
Bureau of Land
Remedial Project Management Section
Site Remediation Program
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. O'Hara:

**RE: Request for Entry into the Illinois Site Remediation Program
OMC Waukegan Plant 2 Chlorinated Solvent Plume and LUST Area**

Enclosed please find an original and two copies of the Illinois Site Remediation Program Application and Services Agreement Form (DRM-1), along with a \$500 advanced partial payment fee. The form and fee serve as our request to enter two areas at the Outboard Marine Corporation (OMC) Waukegan Plant 2 facility into the Illinois Site Remediation Program (SRP). The two areas include a chlorinated solvent plume, designated as SRP Area 1, and a Leaking Underground Storage Tank (LUST) site, designated as SRP Area 2.

The chlorinated solvent plume was discovered during previous sampling conducted near the Plant 2 building. Based on the existing subsurface data, the primary source of the impacts appears to be degreasers previously used in the building. A former solvent still and underground storage tank (UST) are also considered potential contributors to the plume. Considering these sources and based on our previous communication with the USEPA in this matter, OMC believes that this solvent impacted area is completely unrelated to either of the two Superfund actions associated with other areas of the OMC Waukegan property (i.e., the Waukegan Harbor and Coke Plant sites).

The LUST site was identified during previous UST decommissioning activities at OMC Waukegan. Details on the LUST site were provided to the IEPA as part of the standard LUST Program 45-Day Report. Based on the IEPA's review of the report, they recommended that the LUST site be entered into the SRP. The LUST site involves six former USTs that contained waste oil, die lube, hydraulic fluid and mineral spirits. The primary contaminants of concern are BTEX, PNAs and PCBs. Similar to the chlorinated solvent plume, OMC believes that the impacts associated with the LUST site are readily separable from the two aforementioned Superfund actions on the OMC Waukegan lake front property.

As indicated on our application form, OMC is seeking a focused No Further Remediation (NFR) letter for both areas. We intend to submit a site investigation report to the IEPA for both areas by the fall of this year. If necessary, we would be happy to meet with the IEPA either before or after

COPY

RECEIVED

JUN 09 2000

submission of our investigation report to discuss these areas in more detail.

If you have any questions, please feel free to contact me at 847/689-5219, or Michael Rehor, Corporate Manager, Environmental Services, at 847/689-7046.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Roger Crawford". The signature is fluid and cursive, with the first name "J. Roger" and last name "Crawford" clearly distinguishable.

J. Roger Crawford, P.E.

Vice-President

Environmental, Health & Safety

Enclosures

Original and 2 copies of SRP application

\$500 Advanced Partial Payment Fee

cc: J. Moran (C923)

\\S_CORP_01\VOL1\SHARED\EHS\Closure\Waukegan\SRP\SRP App Cover Letter.doc

Illinois Environmental Protection Agency
Bureau of Land
Remedial Project Management Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

FOR ILLINOIS EPA USE:
Log No. _____

- \$500 Advance Partial Payment Included
- DRM-2 SRP Form Included
- DRM-3 Request for Assessment Included
- DRM-4 Tax Credit Budget Plan Included

Site Remediation Program Application and Services Agreement (DRM- 1) Form

I. Site Identification:

Site Name:	<u>Outboard Marine Corporation</u>		
Street Address:	<u>90 Sea Horse Drive</u>		
City:	<u>Waukegan</u>	ZIP Code:	<u>60085</u>
County:	<u>Lake</u>	Approximate Size of Site (Acres):	<u>Areal=15.8 Area2=1.4 Tot.=17.2</u>
Illinois Inventory I. D. Number:	<u>0971900017</u>	U.S. EPA I.D. Number:	<u>IL0000802827</u>
Site Base Map Attached	<input checked="" type="checkbox"/>	Illinois EPA Permit(s):	<u>Air-097190AAK NPDES-IL0002267 RCRA-0971900017</u>
LUST/IEMA Incident Number(s), if applicable:	<u>913462/931471</u>		

II. Remediation Applicant ("RA"):


RA's Name:	<u>J. Roger Crawford</u>	Title:	<u>Vice President, Environmental Health & Safety</u>
Company:	<u>Outboard Marine Corporation</u>		
Street Address:	<u>190 Sea Horse Drive</u>		
City:	<u>Waukegan</u>	State:	<u>IL</u> ZIP Code: <u>60085</u>
Phone:	<u>(847) 689-5219</u>	FEIN or SSN:	<u>36-1589715</u>

I hereby certify that I am authorized to sign this application and services agreement. I certify that the proposed project meets the eligibility criteria set forth in Section 58.1(a)(2) of the Environmental Protection Act (415 ILCS 5/58.1(a)(2)) and regulations promulgated thereunder and that this submittal and all attachments were prepared at my direction. In consideration for the Illinois EPA's agreement to provide (subject to applicable law, available resources, and receipt of the advance partial payment) review and evaluation services for activities carried out pursuant to Title 17 of the Illinois Environmental Protection Act (415 ILCS 5/58-58.12), I agree to

- (1) Conform with the procedures of Title 17 of the Illinois Environmental Protection Act (415 ILCS 5/58 - 58.12) and implementing regulations;
- (2) Allow for or otherwise arrange site visits or other site evaluations by the Illinois EPA when requested;
- (3) To pay any reasonable costs incurred and documented by the Illinois EPA in providing such services; and
- (4) Make an advance partial payment to the Illinois EPA for such anticipated services provided in Section V of this application.

As the Remediation Applicant, I understand that I may terminate this services agreement at any time, by notifying the Illinois EPA in writing that services previously requested under the services agreement are no longer wanted. Within 180 days after receipt of the notice, the Illinois EPA shall provide me with a final invoice for services provided until the date of receipt of such notification.

To the best of my knowledge and belief, this request and all attachments are true, accurate and complete. I hereby certify that I have the authority to enter into this agreement.

RA's Signature:  Date: 6/17/00

IV. Written Permission from the Property Owner (check one of the applicable boxes and provide additional information):

<input checked="" type="checkbox"/> RA is the property owner of the remediation site identified in Section I of this application.
<input type="checkbox"/> RA is not the property owner of the remediation site identified in Section I of this application.
Property Owner's Name: _____
Title: _____
Company: _____
Street Address: _____
City: _____ State: _____ ZIP Code: _____ Phone: _____
I hereby certify that the Remediation Applicant has my permission to enroll the site identified in Section I of this application into the Illinois EPA Site Remediation Program. I certify that the Remediation Applicant and designated representatives have permission to enter upon the indicated premises for the purpose of conducting remedial investigations or activities.
Owner's Signature: _____ Date: _____
For multiple property owners, attach additional sheets containing all the information above along with a signed, dated certification for each.

V. Advance Partial Payment:

The Remediation Applicant shall select <u>one</u> of the following advance partial payment plans:
<input checked="" type="checkbox"/> Plan 1: A \$500 advance partial payment is included with this application. Please make the check payable to: "Treasurer, State of Illinois". Please include "For Deposit in the Hazardous Waste Fund" and the Remediation Applicant's FEIN or SSN on the check; or
<input type="checkbox"/> Plan 2: <u>Request that the Illinois EPA determine the appropriate partial payment (i.e., approximately one-half of the total anticipated costs of the Illinois EPA, not to exceed \$5,000). A completed DRM-3 form ("Request for Assessment of Advance Partial Payment for Anticipated Services") must accompany this application so that the Illinois EPA may determine the appropriate advance partial payment specific to the services requested.</u>
NOTE: Illinois EPA cannot refund payments without a legislative appropriation. Payment under Plan 1 accelerates the review process but increases the risk of forfeiting the payment if the applicant is ineligible. Payment under Plan 2 may result in a larger advance partial payment when a final determination is made on the application, but it reduces the risk of forfeiture.

- **If this application contains plans and reports for review and evaluation by the Illinois EPA, a completed Form DRM-2 must also accompany this submittal.**

The Illinois EPA is authorized to require this information under Section 415 ILCS 5/58-58.12 of the Environmental Protection Act and regulations promulgated thereunder. Disclosure of this information is required as a condition of participation in the Site Remediation Program. Failure to do so may prevent this form from being processed and could result in your application being rejected. This form has been approved by the Forms Management Center. All information submitted as part of this Application is available to the public except when specifically designated by the Remediation Applicant to be treated confidentially as a trade secret or secret process in accordance with the Illinois Compiled Statutes, Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

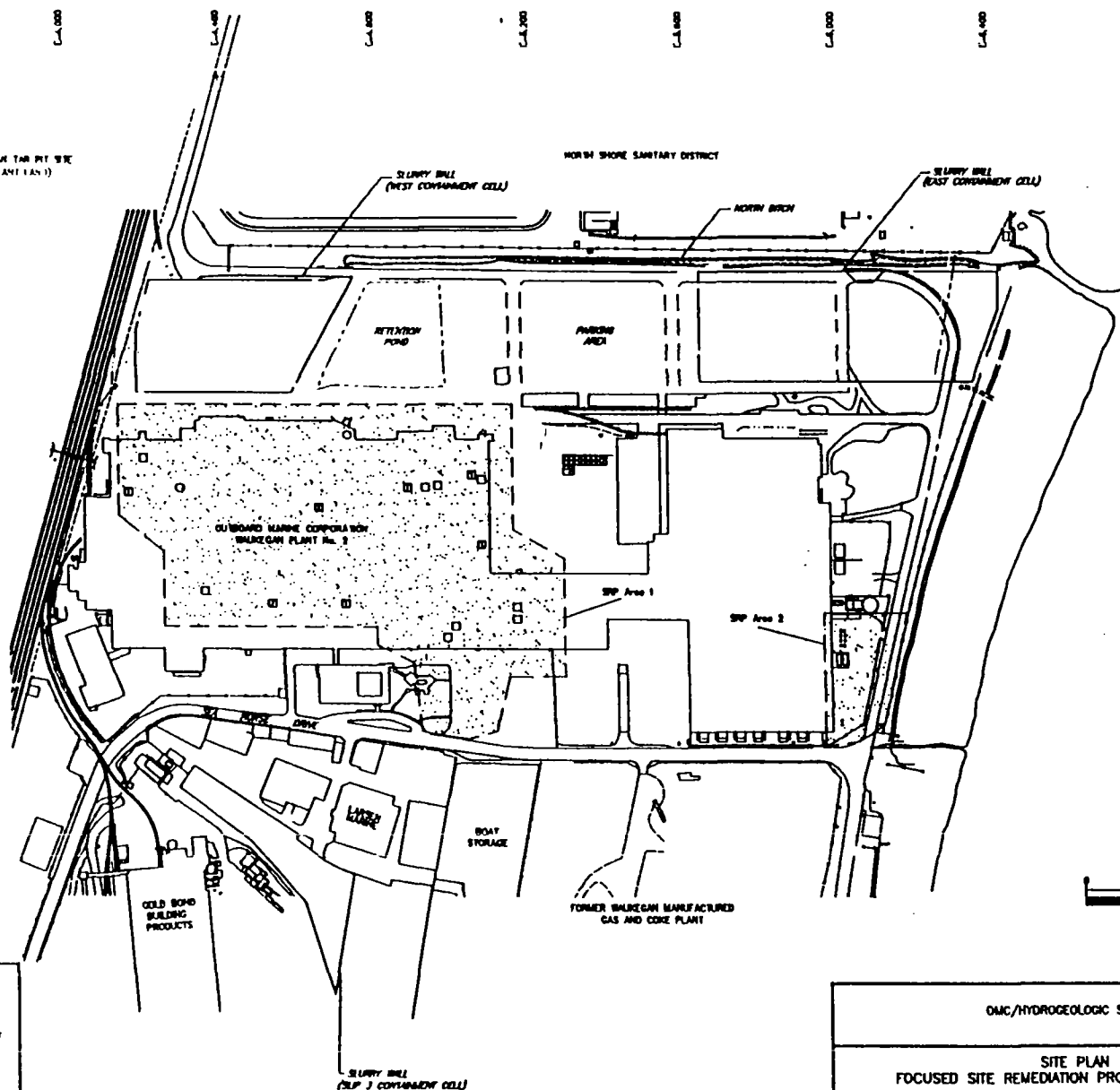
III. Project Objectives:

<p>A. Release Letter Requested. Please complete one of the subsections by checking applicable boxes and including other information (if necessary, additional information may be attached to this application form):</p>	<div style="border: 1px solid black; padding: 5px;"> <input type="checkbox"/> Comprehensive No Further Remediation ("NFR") Letter </div> <div style="border: 1px solid black; padding: 5px;"> <input checked="" type="checkbox"/> Focused NFR Letter Identify the focused contaminants of concern by checking the applicable box(es): SRP Area 2 (Lust Sites) <input type="checkbox"/> Volatiles <input checked="" type="checkbox"/> BTEX <input checked="" type="checkbox"/> PCBs <input type="checkbox"/> Metals <input type="checkbox"/> Semivolatiles <input checked="" type="checkbox"/> PNAs <input type="checkbox"/> Pesticides Other (identify): _____ SRP Area 1 (TCE Plume) - Volatiles only </div> <div style="border: 1px solid black; padding: 5px;"> <input type="checkbox"/> 4(y) Letter Identify the focused contaminants of concern by checking the applicable box(es): <input type="checkbox"/> Volatiles <input type="checkbox"/> BTEX <input type="checkbox"/> PCBs <input type="checkbox"/> Metals <input type="checkbox"/> Semivolatiles <input type="checkbox"/> PNAs <input type="checkbox"/> Pesticides Other (identify): _____ Identify the media of concern by checking applicable boxes: <input type="checkbox"/> Soil <input type="checkbox"/> Sediments Other: _____ Identify the actions (e.g., drum removal, spill response, etc.): <div style="border: 1px solid black; height: 100px; width: 100%; margin-top: 10px;"></div> </div>											
<p>B. Identify any support services being sought from the Illinois EPA in addition to the review and evaluation services (if necessary, additional information may be attached to this application form):</p>	<input checked="" type="checkbox"/> No additional support services are being sought <input type="checkbox"/> Assistance with community relations <input type="checkbox"/> Environmental Remediation Tax Credit Budget Review (Attach DRM-4 application) <input type="checkbox"/> Sample collection and analyses Other (identify): _____											
<p>C. Anticipated Schedule</p>	<table border="1"> <thead> <tr> <th>SRP Document</th> <th>Projected Date of Receipt by Illinois EPA</th> </tr> </thead> <tbody> <tr> <td>Site Investigation Report</td> <td>Fall 2000</td> </tr> <tr> <td>Remediation Objectives Report</td> <td>Fall 2000</td> </tr> <tr> <td>Remedial Action Plan</td> <td>Summer 2001</td> </tr> <tr> <td>Remedial Action Completion report</td> <td>Unknown at this time</td> </tr> </tbody> </table>	SRP Document	Projected Date of Receipt by Illinois EPA	Site Investigation Report	Fall 2000	Remediation Objectives Report	Fall 2000	Remedial Action Plan	Summer 2001	Remedial Action Completion report	Unknown at this time	
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Site Investigation Report	Fall 2000											
Remediation Objectives Report	Fall 2000											
Remedial Action Plan	Summer 2001											
Remedial Action Completion report	Unknown at this time											
<p>D. Identify the current and post-remediation uses of the remediation site (if necessary, additional information may be attached to this application form):</p>	<div style="border: 1px solid black; padding: 5px;"> Current Use: The areas encompassed by and directly adjacent to the remediation sites are currently part of the OMC Plant 2 manufacturing building and associated grounds. The plant is currently used for the manufacture of metal parts and related processes. </div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> Post-Remediation Use: The post-remediation use of the remediation sites is currently expected to remain industrial/commercial. </div>											

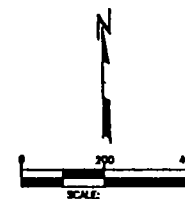
N 6,200 —
N 6,400 —
N 6,600 —
N 6,800 —
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N 7,200 —
N 7,400 —
N 7,600 —
N 7,800 —
N 8,000 —

WALKEGAN TANK PIT SITE
(VARIANT 1 AND 2)

A. L. HANSEN



LAKE MICHIGAN



LEGEND:

- FENCE
- UNIMPROVED ROADWAY
- RAILROAD
- GUARD RAIL
- FORMER DIESELS
- FORMER DIESELS WITH PIT
- FORMER ICE PIT
- FORMER SOLVENT STILL

REFERENCES:

TOPOGRAPHIC MAP BY AERIAL SERVICES, INC.
CEDAR FALLS, IOWA, DATE OF PHOTOGRAPHY
11-28-88

ONC/HYDROGEOLOGIC STUDY/L

SITE PLAN
FOCUSED SITE REMEDIATION PROGRAM BOUNDARIES

MAP	8/31/2008
AS SHOWN	
SPR 50a	1

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Outboard Marine Corporation
Shared Services Disbursements Center
200 Seahorse Drive
Waukegan, IL 60085
(847) 689-5649

06/02/00

00120570

VOID if not presented within 60
days after issue date above

Bank One, NA 0710
Chicago, IL
Payable through First USA Bank, NA
09-30107

EXACTLY FIVE HUNDRED AND 00/100

AMOUNT
\$*****500.00

Not valid for over \$100,000.00
unless Countersigned

PAY TO THE ORDER OF



ILLINOIS STATE TREASURER
ATTN ACCOUNTS RECEIVABLE
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
FISCAL SERVICES SECTION 2
PO BOX 19276
SPRINGFIELD IL 62794-9276

Edu J. Martinez

AUTHORIZED SIGNATURE

00120570 0311002831

09 30107

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Outboard Marine Corporation
Shared Services Disbursements Center
200 Seahorse Drive
Waukegan, IL 60085
(847) 689-5649

06/02/00

VOID if not presented within 90
days after issue date above

00120570

Bank One, NA -0710
Chicago, IL
Payable through First USA Bank, NA

62-28/311
09-30107

EXACTLY FIVE HUNDRED AND 00/100

PAY TO THE ORDER OF

AMOUNT

\$*****500.00

Not valid for over \$100,000.00
unless Countersigned

|||||
ILLINOIS STATE TREASURER
ATTN ACCOUNTS RECEIVABLE
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
FISCAL SERVICES SECTION 2
PO BOX 19276
SPRINGFIELD IL 62794-9276

Eui J. Martinez
AUTHORIZED SIGNATURE

00120570 0311002831

09 30107